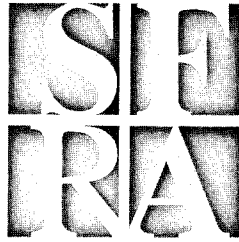


**San Francisco
Redevelopment Agency**

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SSIC NO. 5090.3**

450-00401-190

March 2, 2001

Mr. Richard G. Mach, Jr., P.E.
Department of the Navy, Southwest Division
Naval Facilities Engineering Command
1220 Pacific Highway
San Diego, CA 92132-5190

Re: Response to Navy's RTCs – Final Sampling and Analysis Plan, Parcel C Soil
Site Delineation, HPS January 18, 2001.

Dear Mr. Mach:

The City has reviewed the Navy's Response To Comments (RTC) to the City Comments submitted on December 18, 2000. Regarding RTC No. 6. The City supports the 50-foot residential buffer zone proposed by the Navy, however the proposed residential cleanup depth of 2-foot below ground surface (bgs) within the 50-foot buffer zone is not acceptable. The Navy has not provided any technical justification for proposing only a 2-foot bgs residential cleanup. From our previously submitted comments, the City supports 10-foot bgs residential criteria within the buffer zone.

To successfully and efficiently manage environmental risk within and in the vicinity of a buffer zone, the cleanup goals for the buffer zone should equal the goals established for the more conservative reuse. For the Parcel C buffer zone, the cleanup should be consistent with the existing cleanup criteria of the residential reuse area, i.e. residential cleanup to 10 feet bgs.

The Navy has not technically defended their proposed buffer zone concept with a risk-based assessment. Such an assessment would be necessary in the decision making process with full BCT review and concurrence.

The Navy's current proposal does not effectively deal with the potential for resident exposure to "industrial" clean soil. During typical construction activities (e.g., utility trenching, grading, and building construction) "industrial" soil from between 2 - and 10 - feet bgs will be brought to the surface and through wind and

rain erosion residents at the parcel boundary could be exposed to the contaminants in this soil.

The City cannot agree to a vertically stratified reuse boundary within the buffer zone. Even if a 2-foot vertical buffer could be defended, the enforcement and maintenance of such a remedy would prove burdensome and impractical during redevelopment. Therefore to ensure long-term protection of public health, the buffer zone needs to reflect the more conservative clean-up goal of two differing but contiguous reuse areas. This cleanup goal should be applicable both laterally and vertically.

In addition, the City has reviewed comments from the DTSC per their letter of February 21, 2001 and agrees with the comments presented. Comments of particular importance include: DTSC Comment No. 2 - *Where site characterization sampling is performed, risk-based screening criteria should be used. Tables and figures should show all exceedences of risk-based criteria, not just exceedences of the Navy's TCRA cleanup goals*; DTSC Comment No. 5 - *Provide an explicit summary of waste profiling exceedences in the report that summarizes field activities*; and, DTSC Comment 6 - *Include site DM8025 as a "manganese site" since it is located in the buffer zone and has a manganese exceedence at 1900 mg/kg*. The City has not had the chance to review comments from other BCT members.

The City appreciates the opportunity to provide comment. If you have any questions or need additional information, please contact me at 415-749-2464.

Sincerely,

Handwritten signature of Don Capobres, consisting of a stylized 'D' followed by 'CB'.

Don Capobres
Project Manager

Copy to:

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